

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.; HYNIX SEMICONDUCTOR AMERICA, INC.; HYNIX SEMICONDUCTOR U.K. LTD.; and HYNIX SEMICONDUCTOR DEUTSCHLAND GmbH,

Plaintiffs,

vs.

RAMBUS INC.,

Defendant.

CASE NO. C 00-20905 RMW

{PROPOSED} ORDER AND STIPULATION EXTENDING TIME

Judge: Hon Ronald M. Whyte

RAMBUS INC.,

CASE NO. C 05-00334 RMW

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR AMERICA INC., HYNIX SEMICONDUCTOR MANUFACTURING AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., SAMSUNG AUSTIN SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION, NANCY TECHNOLOGY CORPORATION U.S.A.,

Defendants.

RAMBUS INC.,

CASE NO. C 05-02298 RMW

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., SAMSUNG AUSTIN SEMICONDUCTOR, L.P.,

Defendants.

1

2

3

RAMBUS INC.,

4

Plaintiff,

5

vs.

6

MICRON TECHNOLOGY, INC., and
MICRON SEMICONDUCTOR PRODUCTS,
INC.,

7

Defendants.

8

9

10

STIPULATION AND PROPOSED ORDER EXTENDING TIME

11

12

13

Whereas the Court entered a Joint Case Management Order ("CMO") on April 24,
2007;

14

15

Whereas the CMO provides that July 20, 2007 is the date on which the party or
parties with the burden of proof on an issue is required to provide an expert report on that issue;

16

17

Whereas the CMO set August 17, 2007 as the date on which the parties are
required to provide rebuttal expert disclosures and reports;

18

19

Whereas the expert discovery cutoff set forth in the CMO is September 17, 2007;

20

21

Whereas the CMO set October 1, 2007 as the last day to file summary judgment
and Daubert motions;

22

23

Whereas, on June 27, 2007, the Court scheduled a further case management
conference to take place on November 7, 2007;

24

25

Whereas Micron Technology, Inc., Micron Semiconductor Products, Inc., Hynix
Semiconductor, Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd.,
Hynix Semiconductor Deutschland, GmbH, Samsung Electronics Co., Ltd., Samsung Electronics
America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, L.P., Nanya
Technology Corporation and Nanya Technology Corporation USA (collectively the
"Manufacturers") and Rambus Inc. served their expert disclosures on June 22, 2007;

26

27

28

CASE NO. C 06-00244 RMW

1 Whereas the Manufacturers' experts require additional time to complete their expert
2 reports;

3 Whereas the Manufacturers requested a twelve-day extension of time to submit any
4 party's initial expert report(s), and Rambus Inc. agreed to the Manufacturers' request;

5 Whereas Rambus in turn requested a twenty-four-day extension of the time to
6 submit any party's rebuttal report(s), and the Manufacturers agreed to Rambus's request;

7 Whereas the parties have agreed, subject to the Court's approval, to modify the
8 schedule set forth in the Joint Case Management Order dated April 24, 2007;

9 NOW therefore, it is hereby AGREED and STIPULATED, by and among the
10 parties hereto through their undersigned counsel, that: (i) the date on which the party or parties
11 with the burden of proof on an issue shall provide an expert report on that issue is moved from
12 July 20, 2007 to August 1, 2007; (ii) the date on which the parties shall provide rebuttal expert
13 disclosures and reports is moved from August 17, 2007 to September 10, 2007; (iii) the last day
14 for expert discovery is moved from September 17, 2007 to October 8, 2007; (iv) the last day to
15 file summary judgment and Daubert motions is moved from October 1, 2007 to October 17, 2007;
16 and (vi) the further case management conference and the hearing date for summary judgment and
17 Daubert motions is moved from November 7, 2007 to November 21, 2007.

18
19 SO ORDERED,

20 DATED: 7/16/07



21 HON. RONALD M. WHYTE
22
23
24
25
26
27
28
29

DATED: July 12, 2007

Respectfully submitted,

FOR THE MANUFACTURERS

By /s/ Hal Barza

Harold A. Barza

William Price

Robert Becher

QUINN EMANUEL URQUHART OLIVER & HEDGES

865 South Figueroa Street, 10th Floor

Los Angeles, California 90017-2543

Jared Bobrow

John D. Beynon

WEIL, GOTSHAL & MANGES LLP

Redwood Shores, CA 94065

Attorneys for

MICRON TECHNOLOGY, INC., and

MICRON SEMICONDUCTOR PRODUCTS, INC.

By /s/ Anita Kadala

David J. Healey

Anita E. Kadala

WEIL, GOTSHAL & MANGES LLP

Houston, TX 77002

Alan J. Weinschel

WEIL, GOTSHAL & MANGES LLP

New York, NY 10153

Matthew D. Powers

Edward R. Reines

WEIL, GOTSHAL & MANGES LLP

Redwood Shores, CA 94065

Attorneys for

SAMSUNG ELECTRONICS CO., LTD.,

SAMSUNG ELECTRONICS AMERICA, INC.,

SAMSUNG SEMICONDUCTOR, INC., and

SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

By /s/ Robert Freitas

Robert E. Freitas

Kai Tseng

Craig R. Kaufman

Denise M. Mingrone

ORRICK, HERRINGTON & SUTCLIFFE LLP

Menlo Park, CA 94025

Attorneys for

NANYA TECHNOLOGY CORPORATION and NANYA

TECHNOLOGY CORPORATION U.S.A.

1
2
3 By /s/ Susan van Keulen
4 Theodore G. Brown, III
5 Susan van Keulen
6 TOWNSEND and TOWNSEND and CREW LLP
7 379 Lytton Avenue
8 Palo Alto, California 94301
9

10
11
12 Attorneys for
13 HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR
14 AMERICA INC., HYNIX SEMICONDUCTOR
15 MANUFACTURING AMERICA INC., HYNIX
16 SEMICONDUCTOR U.K. LTD., and HYNIX
17 SEMICONDUCTOR DEUTSCHLAND GmbH
18
19
20
21
22
23
24
25
26
27
28

12 DATED: July 12, 2007 FOR RAMBUS INC.
13
14 By /s/
15 Carolyn Hoecker Luedtke
16 MUNGER, TOLLES & OLSON LLP
17 560 Mission Street, 27th Floor
18 San Francisco, CA 94105
19
20
21
22
23
24
25
26
27
28

19
20
21
22
23
24
25
26
27
28
Attorneys for
RAMBUS INC.

1

2 **Notice of this document has been electronically sent to:**

3 **Counsel for Plaintiff(s):**

4 Craig N. Tolliver ctolliver@mckoolsmith.com
Pierre J. Hubert phubert@mckoolsmith.com
5 Brian K. Erickson berickson@dbllp.com,
David C. Vondle dvondle@akingump.com
6 Gregory P. Stone gregory.stone@mto.com
Carolyn Hoecker Luedtke luedtkech@mto.com
7 Peter A. Detre detrepa@mto.com
Burton Alexander Gross burton.gross@mto.com,
8 Steven McCall Perry steven.perry@mto.com
Jeannine Y. Sano sanoj@howrey.com
9

10 **Counsel for Defendant(s):**

11 Matthew D. Powers matthew.powers@weil.com
David J. Healey david.healey@weil.com
Edward R. Reines Edward.Reines@weil.com
12 John D Beynon john.beynon@weil.com
Jared Bobrow jared.bobrow@weil.com
13 Leeron Kalay leeron.kalay@weil.com
Theodore G. Brown, III tgbrown@townsend.com
14 Daniel J. Furniss djfurniss@townsend.com
Jordan Trent Jones jtjones@townsend.com
15 Kenneth L. Nissly kennissly@thelenreid.com
Geoffrey H. Yost gyost@thelenreid.com
16 Susan Gregory van Keulen svankeulen@thelenreid.com
Patrick Lynch plynch@omm.com
17 Jason Sheffield Angell jangell@orrick.com
Vickie L. Feeman vfeeman@orrick.com
18 Mark Shean mshean@orrick.com
Kai Tseng hlee@orrick.com
19

20 Counsel are responsible for distributing copies of this document to co-counsel that have not
21 registered for e-filing under the court's CM/ECF program.

22 **Dated:** 7/16/07

SPT
Chambers of Judge Whyte

23

24

25

26

27

28